MEM – HIPPA Breach Protocol

Purpose:

This procedure explains the process of how to report a HIPAA Breach.

Identification of Roles:

Project Manager (PM)
Operations Manager (OM)
Member Services Analyst (MSA)
Contract Administration Officer (CAO)

Performance Standards:

HIPAA Breaches should be reported within 2 business days of the discovery of the breach.

Path of Business Procedure:

Step 1: HIPAA Breach should be reported to MSA as soon as the breach is discovered.

Step 2: MSA will research the reported breach to verify if there was a true HIPAA breach of an error was made.

- a. If the report was a HIPAA breach then move onto step 3.
- b. If the report was not a HIPAA breach but an error, the MSA will notify the UL who will educate the offender on their mistake.

Step 3: The MSA will complete the HIPAA breach form found at the following location: \\Dhsime\memsrv_management\HIPAA

- a. The Contact Person for Incident will be the OM and the PM.
- b. Contact Person's Title will be the OM and the PM's title.
- c. Contact's Address: 100 Army Post Rd, Des Moines, IA 50315
- d. Contact's Email: The OM or the PM's email address.
- e. Contact's Phone number: The OM and the PM's phone number.
- f. Date of Breach: This is the date the violation occurred.
- g. Date of Discovery of Breach: This is the date the breach was discovered.
- h. Detailed Description of the Breach: This is the details of how the breach happened.
- i. Types of Unsecured PHI involved: This area details what information was released during the violation.
- j. What steps are being taken to investigate the breach or mitigate losses: This is where the OM and PM detail how the unit will be responding to the breach.

Step 4: MSA will forward the HIPAA breach form to the OM and PM asking them to complete the box detailed in step 3 letter j.

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Step 5: OM or PM will complete the information needed and send back to MSA.

Step 6: MSA will note the breach in a report named Member Services HIPAA Report found in the following location: \\Dhsime\memsrv_management\HIPAA

Step 7: MSA will forward the HIPAA breach form to the CAO for processing.

Step 8: MSA, OM, or PM will follow the action detailed in the box detailed in step 3 letter i.

Step 9: PM will submit a quarterly HIPAA Compliance Report (SFY) to the CAO. Reports can be found in the following location: \Dhsime\memsrv_management\HIPAA\HIPAA Breaches\IME Quarterly Reports to CAO.

Forms/Reports:

None

RFP References:

Not Sure

Interfaces:

MMIS RECIPIENT ELIGIBILITY SUBSYSTEM
OnBase Workview
OnBase Workflow
Microsoft Office

Attachments:

None